

***FORM X. NARRATIVE SUMMARY OF RESPONSIVENESS TO LOCAL NEEDS**

FORM X.A. DESCRIPTION OF PROPOSED CABLE SYSTEM

Describe in narrative form your concept of the cable system (HSN and I-Net) proposed for the Reston Franchise Area, including anticipated system development over the life of the Franchise. Describe and emphasize particularly those features which are not included in any other section of the Request for Proposals which the Applicant desires the County to consider in evaluating the proposal.

If the Applicant proposes to provide any other service, facility or equipment which the Applicant may wish to contend is relevant in determining whether the Applicant's proposal meets the cable-related needs and interests of the community, it should describe the service, facility or equipment in complete detail; describe how it will be provided, under what circumstances and for what charge.

Emphasis should be given to explaining why the Applicant believes its proposal is reasonable to meet the cable-related needs and interests of the community, taking into account the cost of meeting such needs and interests.

- a. Is the Applicant proposing to construct a system which meets or exceeds the requirements in this RFRP? If not, identify each and every deviation from the requirements and the entire reason for each deviation.
- b. Is the Applicant proposing to construct a system which conforms to the model in this RFRP? If not, identify each and every difference from the model and the entire reason for each difference.

Comcast's description below of the cable system demonstrates that the system substantially conforms to the model the County envisions. However, to the extent the County's model seeks to dictate specific technical standards, transmission technologies, and equipment that Comcast is to use for the subscriber network, PEG facilities, and the I-Net, Section 624(e) of the Cable Act clearly preempts LFAs from regulating in this area, as discussed more fully in the accompanying Memorandum on Legal Issues.

* The Memorandum on Legal Issues submitted as part of the Proposal sets forth the legal principles governing Comcast's response to this Form.

HSN

The current Reston HSN was constructed to, and is operated and maintained to be in compliance with among others, the National Electrical Code, the National Electrical Safety Code and all applicable state and local ordinances.

The plant is a 750MHz, hybrid fiber-coaxial (HFC), two way activated system delivering both analog and digital signals. The system currently provides our customers with their choice of 78 analog channels and 210 digital channels including, Video on Demand, Digital Video Recording, Pay-Per-View, HDTV and high-speed Internet service. There are optical nodes with redundant routed sets of fibers. All power supplies are battery standby operating at 90 volts and are inspected a minimum of twice per year. All taps are classified as uninterruptible. The headend has a standby generator with at least 24 hours of fuel and an uninterruptible power supply (UPS) to cover the time it takes to switch to generator power, once a loss of commercial power is detected and to switch back once power is restored. The generator is tested weekly and inspected monthly.

The facilities and equipment used in the Reston HSN are of high quality, are extremely reliable and are comparable to systems of similar design. The system is operated and maintained so as to meet, or exceed, all applicable FCC technical standards.

Comcast has the facilities and equipment sufficient to cure, and to prevent in the future, any violations of FCC technical standards and/or other standards identified during the renewal process.

Comcast has all facilities and equipment necessary to evaluate system performance for purposes of complying with applicable technical standards.

As stated elsewhere in this response, Comcast will install in 2005, status monitoring systems for both our power supplies and our optical nodes which will allow us to monitor several different performance parameters, including the state of operation of our power supplies (on commercial power or in standby mode, and notifying us when that state changes from one to the other).

All of our plant is locatable utilizing currently available locating devices.

Our facilities and equipment are capable of continuous, twenty-four hour, daily operation without severe material degradation of signal, except during extremely inclement weather, and immediately following extraordinary storms which adversely affect utility services or which damage major system components. The facilities and equipment are also capable of operating and meeting all specifications set forth herein over an outdoor temperature range of -20 degrees F. to +120

degrees F., and over variations in supply voltages from 105 to 130 volts AC (rms), without catastrophic failure or irreversible performance changes.

The HSN, its facilities, components and equipment have been engineered, designed, and constructed. The system is operated in such a manner as to avoid interference with the reception of off-the-air signals by a subscriber. It is also monitored to minimize interference caused by a subscriber.

The HSN, its facilities, components and equipment have been engineered, designed, and constructed; and are operated in such a manner as to protect the safety of system workers and the public.

Comcast maintains sufficient trucks, tools, testing equipment, monitoring devices and other equipment and facilities and trained and skilled personnel required to enable it to comply with each and every requirement of applicable law, including applicable customer service requirements and including requirements for responding to system outages.

Comcast has all facilities and equipment required to properly test the system and conduct an ongoing and active program of preventative maintenance and quality control and to be able to quickly respond to customer complaints and resolve system problems.

The current system is interconnected with the Cox Communications system via a fiber optic link from Merrifield to the Reston headend facility located at 1720 Wiehle Avenue. Any interconnection will be at the request of and cost to the County.

Our tower, co-located with our headend at 1720 Wiehle Avenue, is designed and maintained in accordance with the Uniform Building Code, as amended and painted, lighted, erected and maintained in accordance with all applicable rules and regulations of the Federal Aviation Administration, the Federal Communications Commission, and all other applicable codes and regulations.

Our facilities and equipment at the headend allow us to transmit or cablecast signals in substantially the form received, without substantial alteration or deterioration, including color video, stereo audio signals and closed captioning signals. There is adequate ventilation and space so that components can operate properly, problems can be easily identified, and the components can be easily maintained.

As stated elsewhere in this response, Comcast utilizes a variety of methods to support parents in exercising their parental control over what their children watch on television. Digital and analog addressable converters have parental control capability (subscriber generated PIN). We also purchase, as required, single channel traps for cable-ready TV sets.

Comcast will act consistent with the Customer Service Standards as set forth in the FCC requirements.

The County may access the system to the extent that it is consistent with national and state EAS procedures, regulations and plans and if the County has the necessary digital equipment to access the EAS system.

Comcast routinely splits nodes as it becomes necessary to maintain proper technical operations. If any node in Reston has factors that indicate it needs to be reduced in size, Comcast will split the node, or otherwise redistribute the homes passed as necessary to maintain proper technical operations.

The current system was voluntarily upgraded in 1998/1999. We believe that the current HSN system meets or exceeds the requirements laid out in the RFRP. The current system is, and has been, delivering all of the currently available enhanced services to our customers in Reston. It is capable of being economically modified to deliver future, additional, services as they become a viable business imperative, such as Voice Over Internet Protocol (VoIP). The current HSN system built, maintained and operated by Comcast currently meets and exceeds the Model outlined in the RFRP, and will continue to do so for the foreseeable future.

I-Net

The current Reston I-Net is a mid-split HFC plant. Forward bandpass is 150 - 330 MHz, return is 5 - 112 MHz. Comcast limits cascades to 9 active components maximum, downstream of the optical node

Comcast is prepared to construct a new fiber optic institutional network in Reston to the sites requested by the County, using a design provided by the County. The cost of constructing an I-Net at this time will be substantially higher than it might have been if it had been performed at the same time the Reston system was upgraded, because of the savings on labor costs when the projects are completed simultaneously. Comcast is nevertheless prepared to contribute a substantial portion of the cost of the project. In light of the size of the Reston community and the limited interest of our customers in financing a County communications network, Comcast must limit the amount it will pay to \$500,000. The County would be expected to bear the remainder of the cost. Should the County prefer to select another company to construct the new I-Net facilities in Reston, Comcast would provide a capital grant of up to \$500,000 toward that construction.